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TO: Ms. Paula J. Landis, Chief, Division of
Integrated Regional Water Management
DWR

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DATE: November 22, 2010

NO. OF PAGES: 6 (includes cover sheet)

RE: Draft CASTER Documents
(BX 76) -- Comment Deadline 11/22/2010.

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Simi Valley, CA 93063
November 22, 2010

Ms. Paula J. Landis, Chief, Division of
Integrated Regional Water Management
Department of Water Resources
1416 Ninth Street
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Draft CASGEM Documents (SB X7 6; Water Code Amendment)--
11/22/2010 Public Review and Comment Period Deadline.

Dear Ms. Landis:

Please note that my comments are all directed toward the
Draft DWR Groundwater Elevation Monitoring Guidelines.

Ms. Landis, while the Agency's "WHAT'S NEW?" (Website) notice
on the aforementioned subject stated that "DWR is interested in
your feedback...", and the enclosed letter from you was
addressed "to all parties interested in the CASGEM Program",
nothing could be further from the truth.

DWR WEBSITE "WHAT'S NEW?" SECTION

#1 - It is stated in the notice that "The comment period
was reduced in order to finalize the documents prior
to the January 1, 2011 legislatively mandated filing
deadline for local entities to notify DWR of their
interest in becoming a Monitoring Entity". Since I
did not read anything relative to this being part of
an Emergency Regulation action, the public review and
comment period should not have been reduced in light
of the fact that SBX7 6 "establishes, for the first
time in California, collaboration between local
monitoring parties and DWR to collect groundwater
elevations statewide and that this information be made
available to the public" (Overview of SBX7 6).

The public review and comment period should also not
have been reduced because according to your November
1, 2010 letter, the CASGEM Program establishes "a

permanent, locally-managed program of regular and systemic monitoring in all of California's alluvial groundwater basins"...DRW will also continue its current network of groundwater monitoring as funding allows...If DWR takes over monitoring of a basin, certain entities in the basin may not be eligible for water grants or loans administered by the State" (Page 1)." Yet, "The law anticipates that the monitoring of groundwater elevations...will be done by local entities"(Page 1), and this is a voluntary program from what I am reading.

The public review and comment period should not have been reduced because the Draft Groundwater Elevation Monitoring Guidelines is a very technically minded type document that is of utmost importance in the compilation of the private and public water purveyors' legislatively required 2010 Urban Water Management Plans (UWMPs)--due around June 2011(my understanding).

- #2 - It is stated in the notice that "All comments are due by November 22, 2010. Please provide your name and agency or affiliation with your comment(s) so that DWR has a better understanding of the context; CASGEM legislation has different requirements depending on the entity status". I am a homeowner and a resident in the City of Simi Valley, and a taxpayer of the State of California. Neither of these labels apply to the CASGEM Program legislation, but my status as "a member of the public", and as "an interested person/party" does apply under the State of California public participation process Government Code section.
- #3 - A facsimile number is not provided for members of the public to submit comments. All historic/traditional public comment submittal tools must be allowed.
- #4 - Since "DWR is developing the on-line Monitoring Entity submittal system and anticipates that the system will be accessible through the CASGEM website by mid-December"(your November 1, 2010 letter, Page 2), then the Drafts' public review and comment period should not have been reduced if indeed "DWR appreciates... the public input to the process"(your November 1, 2010 letter, Page 3).

DRAFT GROUNDWATER ELEVATION MONITORING GUIDELINES

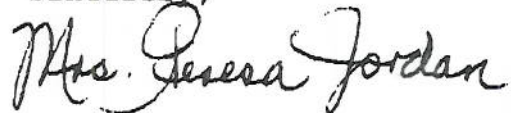
- #1 - The draft is a well compiled document.
- #2 - Page 1, it is stated, in the last sentence under SELECTION OF MONITORING WELLS FOR MONITORING PLANS, that "Dedicated groundwater monitoring wells with known construction information are preferred over production wells to determine static water levels, and monitoring wells near rivers or aquifer storage and recovery projects should be avoided due to the potential for rapidly fluctuating water levels and engineered groundwater systems". The City of Simi Valley City Council/WWD No. 8 Board of Directors recently approved new water wells in the Tapo Canyon Groundwater Basin area to replace existing water wells that just a few years ago replaced existing water wells. One of the users of this well water submitted concerns. The local government entity also recently approved an agreement with a local drinking water (groundwater) purveyor relative to sharing customer information but to also keep this ID documentation confidential. It seems that the City is jumping hoops ahead of the anticipated CASGEM Program guidelines, or the legislation itself and possibly causing unanticipated problems, or undue hardships for all, or some entities, or perhaps to be compliant with old and new State Water Codes.
- #3 - Page 3, it is stated that a "lower-resolution contour map might be sufficient in an area with few people or a low reliance upon groundwater". No. A higher-resolution contour map must also apply in an area with few people or a low reliance upon groundwater. On November 17, 2010, the City of Simi Valley Planning Commission held a public hearing on the Final EIR for the Whiteface Specific Plan area. According to the textual information the applicant wants to delete the already designed Dry Canyon Regional Stormwater Detention Basin from the Specific Plan in order to build 300+ residences in one of the largest stormwater flow areas of town. While the Planning Commission delayed approval, nothing can stop the City Council or the applicant from appealing it and moving ahead in light of the fact that the Tapo Canyon Water Treatment Plant has already been constructed.

- #4 - Page 11, bottom of page, though "a pressure transducer with a data logger provides a much better picture of what is happening with water levels over time" "the semi-annual measurements required by the CASGEM program can be satisfied with the use of a steel or electric sounding tape or sonic meter".
- #5 - Page 11, I am concerned that I don't know which "USGS guidelines have been adopted with only minor modifications for the monitoring wells of the CASGEM program", and which "additional modifications have been incorporated in the guidelines for production wells" since I am only a lay person.
- #6 - Page 18 and others, there is no explanation for the text in lighter print to indicate if these are additional comments relative to agencies, or stakeholders earlier reviews of draft guidelines before the draft document was release for public review and comment period, or to indicate that these statements bear more weight than the rest of the guidelines listed in the respective sections.
- #7 - Page 24, number 1, under After making a measurement, is incorrectly indented.
- #8 - Page 25, I am concerned over what is stated at the bottom of the page, "Pressure-transducer accuracy decreases linearly with increases in the depth range(also known as pressure rating)...But if the measurement range exceeds the depth range of a pressure transducer, it can be damaged. So it is important to have a good idea of the expected range of groundwater levels in a well, and then refer to the manufacturer's specification when selecting a pressure transducer for that well".
- #9 - Page 26, I am concerned over the "disadvantages of automated monitoring".
- #10 - Pages 2, 9, 12, 15, 18, 20, 22, 23, 24, 25, and 28, have the word "Table"(for Tables 1 through _) wherever it appears in bold print to be reader friendly. Please capitalize the letter "T" on the pages that have the lower case "t".

- #11 - Pages 3, 8, 9, 12, 21, 26, and 28, have the word "Figure" wherever it appears in bold print to be reader friendly. Please capitalize the letter "f" on the pages that have the lower case "f".
- #12 - Page 21, Table 6's subject's word "DAT A" must be corrected. The entire form must be in bold print for legibility.

Ms. Landis, please have the submitted comments posted on the DWR Website. Reading the submittals of experts, and public and private stakeholders is one way that I add to my knowledge in order to address City, County, State, and Federal government related issues. I waited for months to have my comments posted on the 2009 Water Conservation Act Website, and to date I still have not come across the consultant(s) results for the Communities Handbook on Land Use and Planning public comments. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Mrs. Teresa Jordan". The signature is written in dark ink and is positioned above the printed name.

Mrs. Teresa Jordan